

EXHIBIT 1

From: [Haoyi Chen](#)
To: [Woodall, Amanda](#)
Cc: [Naydonov, Anna](#); [LeGolian, Andy](#); [Horowitz, Steven](#); [Binder, Matt](#); [Chari, Deepa A](#); [Robert Greenspoon](#); [William Flachsbart](#); [Christopher Fahy](#)
Subject: Re: Re: custodial declaration for updated data of defendants in #607 case
Date: Friday, March 29, 2024 6:22:41 PM

EXTERNAL EMAIL - Use caution with links and attachments.

Received with thanks!

Arch & Lake LLP

Haoyi Chen PhD JD / Partner

haoyichen@archlakelaw.com

Arch & Lake LLP

2500 Wilcrest, Suite 301

Houston, Texas, 77042

Phone: 346-335-9890

Fax: 312-614-1873

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On Fri, Mar 29, 2024 at 6:16 PM Woodall, Amanda <amanda.woodall@whitecase.com> wrote:

Mr. Chen,

Further to my email below, attached please find the custodial declaration with exhibit.
Please treat these as confidential, filed under seal.

Take care,

Amanda Woodall | Associate

T [+1 713 496 9700](tel:+17134969700) **M** [+1 832 651 1875](tel:+18326511875) **E** amanda.woodall@whitecase.com

White & Case LLP | 609 Main Street, Suite 2900 | Houston, TX 77002

From: Woodall, Amanda <amanda.woodall@whitecase.com>
Sent: Friday, March 29, 2024 8:53 AM
To: Haoyi Chen <haoyichen@archlakelaw.com>
Cc: Naydonov, Anna <anna.naydonov@whitecase.com>; LeGolván, Andy <andy.legolvan@whitecase.com>; Horowitz, Steven <shorowitz@sidley.com>; Binder, Matt <mbinder@sidley.com>; Chari, Deepa A <dchari@sidley.com>; Robert Greenspoon <rgreenspoon@dbllawyers.com>; William Flachsbart <wflachsbart@dbllawyers.com>; Christopher Fahy <christopher@archlakelaw.com>
Subject: RE: [EXT] Re: custodial declaration for updated data of defendants in #607 case

Mr. Chen,

Per your request below, Temu produces the attached updated data. The password is data2024. Please treat this as confidential, filed under seal.

We will send the requested custodial declaration as soon as practicable.

Thank you.

Amanda Woodall | Associate

T [+1 713 496 9700](tel:+17134969700) **M** [+1 832 651 1875](tel:+18326511875) **E** amanda.woodall@whitecase.com

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From: Haoyi Chen <haoyichen@archlakelaw.com>

Date: Wednesday, Mar 27, 2024 at 9:53 PM

To: LeGolvan, Andy <andy.legolvan@whitecase.com>, Naydonov, Anna <anna.naydonov@whitecase.com>

Cc: Horowitz, Steven <shorowitz@sidley.com>, Binder, Matt <mbinder@sidley.com>, Chari, Deepa A <dchari@sidley.com>, Robert Greenspoon <rgreenspoon@dbllawyers.com>, William Flachsbart <wflachsbart@dbllawyers.com>, Christopher Fahy <christopher@archlakelaw.com>

Subject: [EXT] Re: custodial declaration for updated data of defendants in #607 case

"Dear Temu Counsel:

I write on behalf of the defendants in the 607 Schedule A Roadget case now pending before Judge Jenkins.

As we are preparing defendants' oppositions to Roadget's motions pending before Judge Jenkins, I would like to request that Temu produce to my clients and Roadget updated data on the restrained amounts for each defendant merchant, along with a declaration similar to the Declaration previously provided in this case, under oath, of a person at Temu which again describes the following:

How the data was collected for the restrained amounts for each defendant merchant;
How the data reflecting these amounts are stored at Temu;
How the data was extracted into the reports shown to us and to Roadget; and
Confirmation (if possible) that the data is extracted from Temu data or systems kept in the ordinary course of Temu's business.

As before, we would like to provide authentication of the data and a description of the collection of the data for the Court.

Please feel free to contact me or Christopher Fahy with any questions, and please copy Roadget counsel with any response.

Thank you.

Arch & Lake LLP

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